

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Grid Resilience in Regional Transmission)
Organizations and Independent System) Docket No. AD18-7-000
Operators)**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS AND
REQUEST FOR EXPEDITED TREATMENT OF
ENERGY INDUSTRY ASSOCIATIONS**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission” or “FERC”), 18 C.F.R. § 385.212 (2016), the Advanced Energy Economy, American Council on Renewable Energy, American Petroleum Institute, American Wind Energy Association, American Public Power Association, Electric Power Supply Association, Electricity Consumers Resource Council, Interstate Natural Gas Association of America, Independent Petroleum Association of America, Natural Gas Supply Association and Solar Energy Industries Association (collectively, “Energy Industry Associations”) hereby respectfully submit this motion for extension of time for filing reply comments in response to the filings made in this proceeding on March 9, 2018 by the Regional Transmission Organizations/Independent System Operators (“RTOs/ISOs”). For the reasons discussed below, the Energy Trade Associations request a thirty (30) day extension of the deadline for reply comments established in the Commission’s January 8, 2018 Order in this proceeding.¹

¹ Reply comments are currently due on or before April 9, 2018. If the Commission were to grant our 30-day extension request, reply comments would be due on or before May 9, 2018.

I. BACKGROUND

On January 8, 2018, the Commission issued an order terminating the proceedings initiated in Docket No. RM18-1-000 to consider a “Proposed Rule on Grid Reliability and Resilience Pricing” submitted to the Commission by the Secretary of Energy on September 28, 2017.² In that order, the Commission initiated this docket to “specifically evaluate the resilience of the bulk power system in the regions operated by [RTOs/ISOs]”, and directed the RTOs/ISOs to submit information to the Commission on certain identified resilience issues and concerns. On March 9, 2018, all six Commission-jurisdictional RTOs/ISOs and the Electric Reliability Council of Texas (“ERCOT”) submitted extensive filings in response to the Commission’s directive.

II. MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS

The filings made by the RTOs/ISOs are significant, and will require substantial time and effort by interested members of the public (including the Energy Industry Associations and their members) to digest and analyze. The filings provide substantial information and details regarding the appropriate definition of resilience, each RTO/ISO’s efforts to assess resilience within its region, and the steps each RTO/ISO has already taken and plan to take on issues impacting the resilience of the bulk power system in their region. Each RTO/ISO filing also contains detailed region-specific information regarding unique resilience challenges they face in their geographic area. Reviewing this detailed information and formulating thoughtful reply comments to aid in the Commission’s consideration of the issues will be time and resource intensive, requiring a careful region-by-region analysis.

In addition, the deadline for reply comments comes at an unusually busy time in the Commission’s calendar. The Energy Industry Associations and their members are also preparing

² *Grid Reliability and Resilience Pricing*, 162 FERC ¶ 61,012 (2018).

for two major two-day technical conferences – one on affected systems coordination in the generator interconnection processes of PJM Interconnection, L.L.C. (“PJM”), Southwest Power Pool, Inc. (“SPP”) and Midcontinent Independent System Operator, Inc. (“MISO”),³ and one on the participation of aggregated distributed energy resources (“DERs”) in RTO/ISO markets.⁴ In addition, Energy Industry Associations and their members anticipate the need to react to a major PJM capacity market design filing during the existing 30-day window to prepare reply comments.

The 30-day extension requested by the Energy Industry Associations will help ensure that a robust record is developed on the resilience issues identified by the Commission in this docket. Granting this additional time will allow the Energy Industry Associations, their members, and other interested parties to give each RTO/ISO filing (and the unique regional issues that each RTO/ISO has identified) the careful attention it deserves and formulate reply comments that will provide a more fulsome record to assist the Commission’s efforts to evaluate the resilience of the bulk power system in each region. This modest extension will not cause a significant delay in the Commission’s consideration of the record and any next steps (if any additional steps are warranted based on the record developed). No entity is prejudiced or burdened by this modest additional time (which will provide an equivalent amount of time for replies as provided to the RTOs/ISOs to file their reports) to formulate reply comments.

III. MOTION FOR EXPEDITED TREATMENT

The Energy Industry Associations respectfully request that the Commission act on this motion by no later than March 21, 2017, and in so doing, make a reduction in the comment period

³ *Reform of Affected System Coordination in the Generator Interconnection Process*, Docket No. AD18-8-000 (Technical Conference scheduled for April 3-4, 2018).

⁴ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Docket No. RM18-9-000 (Technical Conference scheduled for April 10-11, 2018).

for the filing of answers to this motion to reflect this request for expedited treatment. If the Commission is not inclined to grant the extension, interested parties need certainty in this regard as soon as possible so that they can plan accordingly.

IV. CONCLUSION

For the foregoing reasons, the undersigned Energy Industry Associations respectfully request that the Commission grant this motion for an extension of time of 30 days to file reply comments, and the motion for expedited treatment.

Respectfully submitted,

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